

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Juanita Cooper Debtor(s)	Chapter 13 Proceeding No. 17-14859 JKF
Citizens Bank, N.A. f/k/a RBS Citizens, N.A. Objectant(s)	
v.	
Juanita Cooper Respondent(s)	

AMENDED OBJECTION TO CONFIRMATION OF THE PLAN

Citizens Bank, N.A. f/k/a RBS Citizens, N.A., a secured creditor in this case objects to the plan and to the confirmation of the debtor's Chapter 13 Plan and as grounds therefor would show the court the following:

1. The Plan does not provide for the secured creditor, Citizens Bank, N.A. f/k/a RBS Citizens, N.A. to receive the full value of its claim in violation of 11 USC §1325(a)(5)(B)(ii).
2. As of the date of the filing of the bankruptcy on July 19, 2017, Citizens Bank, N.A. f/k/a RBS Citizens, N.A. is the holder of a secured claim in the amount of \$155,586.46 against the debtors' property located at 97 E. Duval Street, Philadelphia, PA 19144. On that date the arrears to be paid through the plan were \$61,005.45. An Amended Proof of Claim was filed by Citizens Bank, N.A. f/k/a RBS Citizens, N.A. on or about October 6, 2017. See Exhibit "A" attached hereto and made a part hereof.

3. Debtor's Plan proposes to pay CCO Mortgage Corp. \$40,000.00 in pre-petition arrears, an amount substantially smaller than Citizens Bank, N.A. f/k/a RBS Citizens, N.A.'s arrears claim.
4. If the Plan is confirmed the Citizens Bank, N.A. f/k/a RBS Citizens, N.A. will suffer irreparable injury, loss and damage.

Respectfully submitted,

/s/ Mary F. Kennedy
Attorney I.D. No. 77149
1310 Industrial Blvd.
1st Floor, Suite 101
Southampton, PA 18966
215-942-9690 phone
215-942-9695 fax
Attorney for Citizens Bank, N.A. f/k/a RBS
Citizens, N.A.